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Attorneys for Defendant  
RSKCO SERVICES, INC.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

JULIA M. BACKMAN, individually )	CIVIL NO. 04-00348 (HG KSC)
and on Behalf of the ESTATE OF )	(Contract)
DANIEL VERNON BACKMAN, and)	
as Next Friend to KELLY KEIKO )	DECLARATION OF EDQUON LEE
VALENE BACKMAN and JODI )	
LEIGH YACHIYO BACKMAN, )	
Minors, )	
)	
Plaintiffs, )	
)	
vs. )	
)	
RSKCO SERVICES, INC., a Illinois )	
corporation; JOHN DOES 1-10; )	
JANE DOES 1-10; DOE )	

PARTNERSHIPS 1-10, DOE )  
CORPORATIONS 1-10; DOE )  
LIMITED LIABILITY )  
ENTITIES 1-10; DOE )  
"NON-PROFIT" CORPORATIONS )  
1-10; and DOE GOVERNMENTAL )  
ENTITIES 1-10, )  
 )  
Defendants. )  
\_\_\_\_\_ )

DECLARATION OF EDQUON LEE

I, EDQUON LEE, declare as follows:

I am an attorney duly licensed to practice law in the State of Hawaii and one of the attorneys for Defendant RSKCO SERVICES, INC. ("RSKCO") in the above-captioned matter.

1. Exhibit "1" is a true and correct copy of the Complaint filed on October 29, 2003.

2. Exhibit "2" is a true and correct copy of the First Amended Complaint filed on November 26, 2003.

3. Exhibit "3" is a true and correct copy of the WC-1 Employer's Report of Industrial Injury.

4. Exhibit "4" is a true and correct copy of a letter dated February 11, 1999 from Clyde Carvalho of RSKCO to the Department of Labor and Industrial Relations, Disability Compensation Division ("DCD").

5. Exhibit "5" is a true and correct copy of a letter dated February 19, 1999 from Clyde Carvalho of RSKCO to Daniel Backman.

6. Exhibit "6" is a true and correct copy of the WC-3 Carrier's Case Report dated October 21, 1999.

7. Exhibit "7" is a true and correct copy of the WC-3 Carrier's Case Report dated January 22, 2001.

8. Exhibit "8" is a true and correct copy of page 1 of Dr. Terry Smith's operative report dated March 9, 1999.

9. Exhibit "9" is a true and correct copy of a letter dated December 27, 2000 from Leighton Oshima of Wong, Oshima & Kondo ("WOK") to David Robinson, Esq.

10. Exhibit "10" is a true and correct copy of a letter dated December 27, 2000 from Leighton Oshima of WOK to the DCD.

11. Exhibit "11" is a true and correct copy of a Request for Authorization from Jon Graham, M.D.

12. Exhibit "12" is a true and correct copy of a facsimile note dated January 17, 2001 from RSKCO to WOK.

13. Exhibit "13" is a true and correct copy of a letter dated January 19, 2001 from WOK to Dr. Graham.

14. Exhibit "14" is a true and correct copy of a letter dated January 19, 2001 from WOK to Peter Diamond, M.D.

15. Exhibit "15" is a true and correct copy of a letter dated January 26, 2001 from Dr. Diamond to WOK.

16. Exhibit "16" is a true and correct copy of a letter dated January 30, 2001 from WOK to Dr. Diamond.

17. Exhibit "17" is a true and correct copy of a letter dated January 31, 2001 from Mr. Robinson to WOK.

18. Exhibit "18" is a true and correct copy of a letter dated February 14, 2001 from WOK to Mr. Robinson.

19. Exhibit "19" is a true and correct copy of pages 1 and 9 of a report dated March 7, 2001 by Dr. Diamond.

20. Exhibit "20" is a true and correct copy of a letter dated March 14, 2001 from WOK to RSKCO.

21. Exhibit "21" is a true and correct copy of a letter dated March 16, 2001 from RSKCO to WOK.

22. Exhibit "22" is a true and correct copy of a letter dated April 11, 2001 from WOK to Mr. Robinson.

23. Exhibit "23" is a true and correct copy of page 1 of a report dated May 1, 2001 by Dr. Graham.

24. Exhibit "24" is a true and correct copy of a letter dated April 27, 2001 from WOK to Stephen Holmes, M.D.

25. Exhibit "25" is a true and correct copy of page 1 of a report dated June 6, 2001 by Dr. Holmes.

26. Exhibit "26" is a true and correct copy of a letter dated June 12, 2001 from WOK to RSKCO.

27. Exhibit "27" is a true and correct copy of a letter dated June 22, 2001 from WOK to Mr. Backman.

28. Exhibit "28" is a true and correct copy of pages 1-4 of the DCD Decision filed on October 29, 2001.

29. Exhibit "29" is a true and correct copy of pages 1, 48-50 and 54-55 of the Deposition of Jon F. Graham, M.D., taken on October 6, 2005.

30. Exhibit "30" is a true and correct copy of pages 1, 6 and 7 of the DCD Decision filed on June 25, 2003.

31. Exhibit "31" is a true and correct copy of the Order Granting Partial Stay of Payments filed on August 29, 2003.

32. Exhibit "32" is a true and correct copy of pages 1, 7 and 10 of the Amended Decision and Order filed on June 30, 2004.

33. Exhibit "33" is a true and correct copy of pages 1 and 4 of the DCD Decision filed on February 11, 2004.

34. Exhibit "34" is a true and correct copy of pages 1, 2 and 4 of the DCD Decision filed on January 30, 2006.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

DATED: Honolulu, Hawaii, February 15, 2006.

/s/ Edquon Lee  
EDQUON LEE